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Fighting for Employee Justice



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December 3, 2024

VIA ECF

Hon. Lewis J. Liman
United States District Court Judge
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street, Room 15C
New York, N.Y. 10007-1312

Re: ***Igartua v. Good Grades, LLC***
Case No. 1:24-cv-06575 (LJL)

Dear Judge Liman:

I hope this letter finds you well. Our office represents Plaintiff Juan Igartua ("Plaintiff") in the above-referenced Americans with Disabilities Act ("ADA") matter against Defendant Good Grades, LLC ("Defendant"), which was filed on August 30, 2024. The Summons was issued on September 3, 2024 (ECF Dkt. 4). We sent the Summons and Complaint to our process servers, Meridian Investigations & Security in Port Washington, New York, for service upon the Defendants. Unfortunately, we have not yet received the Affidavit of Service.

Due to unforeseen staffing issues, we have been unable to prosecute this action promptly. Our Chief Counsel, Mr. Nathaniel Peckhart, and our Paralegal for the ADA Division, who maintained our calendar, both left our firm in the same week, leaving us significantly understaffed. However, we have recently hired new personnel for this Division and are working diligently to catch up on all pending matters.

We deeply regret our failure to attend the 11:00 a.m. teleconference and sincerely apologize for any inconvenience this may have caused. We received notice of the hearing at the very last moment and were en route to the office at that time. Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, which permits the court to grant an extension for good cause shown, we respectfully request an adjournment to ensure proper service upon the Defendant. We are also actively attempting to contact the Defendants via email and phone calls.

Rest assured, we are taking all necessary steps to rectify this situation and prevent such occurrences in the future. We will provide the Court with a status update within 15 days. Thank you for your understanding and consideration.

We will apprise the Court of our status within 15 days, as required by Rule 16(b) to ensure continued progress in the case.

Thank you for your understanding and consideration.

Sincerely,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

Jon L. Norinsberg, Esq.

Senior Partner

Attorney for Plaintiff

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